

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re: : Chapter 11
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : Case No. 08-13555 (JMP)
Debtors. : (Jointly Administered)
-----X

-----X
In re: : SIPA Proceeding
LEHMAN BROTHERS INC., : Case No. 08-01420 (JMP)
Debtor. :
-----X

**DECLARATION OF NEIL J. OXFORD IN SUPPORT OF THE MEMORANDUM OF
MOVANTS IN OPPOSITION TO THE MOTION IN LIMINE OF BARCLAYS
CAPITAL INC. FOR AN ORDER EXCLUDING THE EXPERT TESTIMONY OF
DANIEL MCISAAC RELATING TO EXCHANGE TRADED
DERIVATIVES (“ETDs”) AND ETD MARGIN**

I, NEIL J. OXFORD, declare that the following is true and correct.

1. I am a member of the firm of Hughes Hubbard & Reed LLP, attorneys for James W. Giddens (the “Trustee”), as trustee for the SIPA liquidation of Lehman Brothers Inc. I am an attorney duly admitted to practice in the State of New York, and in this Court. I make this declaration based on my personal knowledge, the knowledge of those with whom I work, and the documents referred to herein.

2. I make this declaration in support of the Memorandum of Movants in Opposition to the Motion in Limine of Barclays Capital Inc. for an Order Excluding the Expert Testimony of Daniel McIsaac Relating to Exchange Traded Derivatives (“ETDs”) and ETD Margin (the

“Memorandum in Opposition”), and for the purpose of introducing copies of documents that may be considered in connection with the Memorandum in Opposition.

3. Attached hereto as Exhibit A is a true and correct copy of the Asset Purchase Agreement, dated September 16, 2008.

4. Attached hereto as Exhibit B is a true and correct copy of the transcript of the deposition of Daniel McIsaac, conducted on April 6, 2010.

5. Attached hereto as Exhibit C is a true and correct copy of an email and attachment from Alasdair Hodge to Carole Machell et al., dated September 16, 2008, and marked as Deposition Exhibit 556 (Movants’ Trial Exhibit 506).

6. Attached hereto as Exhibit D is a true and correct copy of an excerpt of the email and attachment from Kenneth Raisler to Tim Stack, dated September 16, 2008, and marked as Movants’ Trial Exhibit 520.

7. Attached hereto as Exhibit E is a true and correct copy of the transcript of the deposition of Kenneth Raisler, conducted on March 1, 2010.

8. Attached hereto as Exhibit F is a true and correct copy of an email and attachment from David Gilberg to Robert Wasserman et al., dated September 19, 2008, and marked as Deposition Exhibit 659A (Movants’ Trial Exhibit 510).

9. Attached hereto as Exhibit G is a true and correct copy of an excerpt of the transcript of the deposition of Anthony Saunders, conducted on February 8, 2010.

10. Attached hereto as Exhibit H is a true and correct copy of the transcript of the deposition of Anthony Leitner, conducted on February 25, 2010.

11. Attached hereto as Exhibit I is a true and correct copy of an excerpt of the email and attachment from Christopher Mincak to Stephen King, dated September 19, 2008, and

marked as Deposition Exhibit 554 (Movants' Trial Exhibit 504).

12. Attached hereto as Exhibit J is a true and correct copy of an excerpt of the email and attachment from Christopher Mincak to Jasen Yang, dated September 19, 2008, and marked as Deposition Exhibit 657 (Movants' Trial Exhibit 509).

13. Attached hereto as Exhibit K is a true and correct copy of an email and attachment from William Navin to Ed Rosen et al., dated September 21, 2008, and marked as Deposition Exhibit 627 (Movants' Trial Exhibit 421).

14. Attached hereto as Exhibit L is a true and correct copy of an email and attachment from Francis Pearn to Tim Stack, dated September 21, 2008, and marked as Deposition Exhibit 555 (Movants' Trial Exhibit 505).

Executed on: July 16, 2010
New York, New York

By /s/ Neil J. Oxford
Neil J. Oxford